

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF TOP ZINC  
LIMITED AND ZINC HOTELS  
(INVESTMENT) LIMITED FOR AN  
ORDER TO TAKE DISCOVERY FOR USE  
IN FOREIGN PROCEEDINGS PURSUANT  
TO 28 U.S.C. §1782

No.: 1:18-MC-00169

**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION TO TAKE DISCOVERY FOR USE IN FOREIGN  
PROCEEDINGS PURSUANT TO 28 U.S.C. §1782**

PLEASE TAKE NOTICE that Top Zinc Limited and Zinc Hotels (Investment) Limited will bring their Motion to Take Discovery for Use in Foreign Proceedings under 28 U.S.C. §1782. The Motion will be based on 28 U.S.C. §1782 and Federal Rule of Civil Procedure 45, this Notice, the accompanying Memorandum of Law in Support of the Motion, the Declarations of David R. Scott, Belinda Anne Hollway, and Mark Derick Payne, and such other argument or evidence as may be presented at the hearing on the Motion.

Dated: April 26, 2018

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ David R. Scott

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